Document 14-2

Filed 04/22/25 Page 1 of 2 Page ID

Case 2:25-cv-02617-FLA-AGR

1

2

3

5

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

## DECLARATION OF JOHN DRINKWATER

I, John Drinkwater, declare:

- I am an adult citizen, and I am the Plaintiff in this action. I am a resident of Arizona. The matters set forth in this declaration are true and correct and within my own personal knowledge. If called to testify, I could and would competently testify thereto.
- I submit this declaration in support of Plaintiff's Response to this Court's 2. Order to Show Cause, ECF No. 12.
- I live with physical disabilities within the meaning of the Americans with Disabilities Act (ADA). I have a physical impairment that substantially limits major life activities including hearing, concentrating, thinking and communicating.
- I am not a high-frequency litigant. This is my first case of this nature. I 4. have filed only one other case with an ADA claim: eleven years ago I filed a case regarding improper permitting that included an ADA cause of action.
  - 5. I am not seeking statutory damages under the Unruh Act.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of April, 2025, at Jucson AZ

DRINKWATER

25 26

27